

353 N. CLARK STREET CHICAGO, IL 60654-3456

JENNER & BLOCK LLP

January 6, 2025

Precious Jacobs-Perry
Tel +1 312 840 8615
Fax +1 312 840 8715
PJacobs-Perry@Jenner.com

Neville S. Hedley
Theodore H. Frank
M. Frank Bednarz
HAMILTON LINCOLN LAW INSTITUTE
1440 W. Taylor Street, #1487
Chicago, IL 60607

Max Schreiber
HAMILTON LINCOLN LAW INSTITUTE
5868 E. 71st Street, Suite E-709
Indianapolis, IN 46220

Re: Tides Center/CJE Rule 11 Motion

Dear Counsel:

We write to again request that the Hamilton Lincoln Law Institute and Plaintiff withdraw the frivolous claims asserted against the Community Justice Exchange (“CJE”) in the First Amended Verified Complaint that the Hamilton Lincoln Law Institute filed in *Christopher Manhart v. AJP Education Foundation, Inc, et al.*, No. 1:24-cv-08209 (N.D. Ill.) (the “First Amended Complaint”) on November 11, 2024. Pursuant to Rule 11(c) of the Federal Rules of Civil Procedure, enclosed is a copy of CJE’s Rule 11 Motion for Sanctions against Plaintiff and his counsel, and CJE’s Memorandum of Law in Support of its Rule 11 Motion, which we plan to file on January 27, 2025, unless the frivolous claims against CJE are withdrawn before that date.

This letter and the attached motion are by no means a complete statement of the defects in Plaintiff’s lawsuit against CJE. Our client expressly reserves all rights and defenses, and nothing stated in or omitted from this letter or the attached motion should be considered a waiver of any of those rights or defenses.

We serve the enclosed motion upon the Plaintiff Christopher Manhart and you, as his counsel who signed the First Amended Verified Complaint, with the expectation that you and your client will give it a considered response and determine to withdraw the frivolous claims within the 21-day period permitted by Rule 11(c)(2).

January 6, 2025

Page 2

Sincerely,

/s/ Precious Jacobs-Perry

Precious Jacobs-Perry

PSJ